

## REMARKS

This application has been reviewed in light of the Office Action dated October 6, 2006. Claims 87-110 are pending in the application, of which Claims 87, 92, 93, 98, 99 and 104-110 are independent.<sup>1/</sup> Claims 87-107 have been amended to define still more clearly what Applicants regard as their invention. Favorable reconsideration is respectfully requested.

With the Preliminary Amendment mentioned above, an Information Disclosure Statement was filed. It is assumed that the Examiner will consider the information cited therein, and return an initialed copy of the form PTO-1449, in due course.

Applicants note with appreciation the indication that Claims 92, 98 and 104-107 have been indicated as being allowable if amended so as not to depend from a rejected claim, and with no change in scope. Those claims have not been so rewritten because, for the reasons given below, their base claims are believed to be allowable.

In the outstanding Office Action, Claims 87-91, 93-97 and 99-103 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 6,025,929 (Nakajima et al.).

As explained in the specification, Applicants' present invention concerns image processing to prepare an image for printing. This is typically done using a table of pre-computed information stored in a data store. The table is recalled from the data store

---

<sup>1/</sup> It is understood that the Preliminary Amendment adding Claims 108-110 reached the Patent and Trademark Office too late for those claims to be considered in this Office Action. Nonetheless, Applicants have not received any statement from the Office indicating that that Preliminary Amendment was not entered, and therefore understand that the claims newly added therein are deemed pending.

and used to process an image when needed. The present invention provides the capability of performing multiple processes on an image using multiple tables, where the processes and tables are specified using a single designated printing mode.<sup>2/</sup>

Independent Claim 87 is directed to a computer program product having a computer readable medium storing a printer driver program for performing processing of image data to be transmitted to a printer. The program comprises processing modules, a database including actual tables corresponding to table IDs used by the processing modules and a search table, including the tables IDs required by the processing modules corresponding to a print mode. Also present in the program is a search module for searching the search table to obtain the table IDs corresponding to the print mode. According to Claim 87, one of the processing modules searches for the actual tables by means of the table IDs obtained by the search module, loads the actual tables and performs a process using the loaded actual tables.

*Nakajima* relates to an image processing arrangement in which inputted image data is subjected to image processing by a matching unit 513 (see Fig. 3), luminance-density conversion unit 514, input correction unit 515, masking unit 516, head shading (HS) processing unit 517, tone reproduction curve (TRC) processing unit 518 and binarization unit 519. The selecting unit 133 controls whether the process operation of the HS processing unit 517 is on or off, as well as the binarization method used by the binarization unit 519, in accordance with an image process condition set by the setting unit 14.

---

<sup>2/</sup> It is of course to be understood that the claim scope is not limited by the details of this or any other particular embodiment that may be referred to.

Even if *Nakajima* is deemed to disclose the process tables that are used in image processing, Applicants submit that nothing in that patent would teach or suggest the “search table including table IDs required by said processing modules corresponding to a print mode” or the “search module for searching the search table to get the table IDs corresponding to a print mode” recited in Claim 87. Because the search table intervenes between the process modules and the actual tables according to Claim 87, the processing modules can get tables adequate to a designated print mode if different tables should be used for different print modes. In the *Nakajima* system in contrast, no search table intervenes between the process and the process table.

For at least these reasons, Claim 87 is believed to be allowable over *Nakajima*.

Independent Claim 105 is directed to a computer program product comprising a computer readable medium storing a printer drive program for performing processing of image data to be transmitted to a printer. The program comprises processing modules, and a database that includes the actual tables corresponding to table IDs used by the processing modules and a search table including the table IDs required by the processing modules corresponding to a print mode. Also present in the program is a search module for searching the search table to get the table IDs corresponding to a print mode. According to Claim 105, one of the processing modules searches the actual tables by means of the table IDs obtained by the search module, loads the actual tables and performs a process using the loaded actual table. In addition, the print mode is determined by plural conditions including paper type, quantization method and print quality, and the actual tables include a color correction table, a color conversion table, a grayscale correction table and a quantization table.

Claim 105 is believed to be allowable over *Nakajima* for at least the reasons given above with regard to Claim 87.

Independent Claim 108 is directed to an image processing method for use in an image processing apparatus having a database containing a search table that includes a plurality of first actual tables, a plurality of second actual tables and IDs for specifying a first table and a second table corresponding to a mode, the plurality of first and second actual tables being independent from a processing module that performs a process for image data to be printed. The method comprises searching an ID of a first table and an ID of a second table corresponding to a mode from the database, loading the found IDs, and loading a first table and a second table corresponding to loaded IDs from the database. The method also includes performing a first process and a second process for an image data to be printed using the first table and the second table loaded.

Claims 109 and 110 are directed to information processing methods that are similar to Claim 108, and all three of these claims are believed to be allowable over *Nakajima* for at least the reasons stated above.

Independent Claims 93, 99, 106 and 107 are each a method or an apparatus claim, respectively, corresponding to one or the other of program Claims 87 and 105, and are believed to be patentable for at least the same reasons as discussed above in connection with the latter claims.

A review of the other art of record has failed to reveal anything which, in Applicants' opinion, would remedy the deficiencies of the art discussed above, as a reference against the independent claims herein. Those claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and allowance of the present application.

Applicants' undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

/Leonard P Diana/  
Leonard P. Diana  
Attorney for Applicants  
Registration No. 29,296

FITZPATRICK, CELLA, HARPER & SCINTO  
30 Rockefeller Plaza  
New York, New York 10112-3801  
Facsimile: (212) 218-2200

NY\_MAIN 616669v1